

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-10521-GAO

BETTY ANNE WATERS, as Administratrix of the  
Estate of KENNETH WATERS,

Plaintiff

v.

TOWN OF AYER, NANCY TAYLOR-HARRIS, in Her  
Individual Capacity, ARTHUR BOISSEAU, In His  
Individual Capacity, WILLIAM ADAMSON, in His  
Individual Capacity and PHILIP L. CONNORS, in His  
Individual Capacity,

Defendants

DEFENDANT PHILIP L.  
CONNORS' MOTION FOR  
SUMMARY JUDGMENT

Now comes the defendant, former Ayer Police Chief Philip Connors ("Connors"), and hereby moves, pursuant to Fed.R.Civ.P. 56(b), for summary judgment on all claims against him as set forth in the Amended Complaint.

As grounds therefor, Chief Connors states that there exists no genuine issue as to any material fact, and that he is entitled to judgment in his favor as a matter of law. As further grounds therefor, Chief Connors relies on the attached Local Rule 56.1 Statement of Material Facts Not In Dispute, and attached supporting memorandum of law.

WHEREFORE, Chief Connors respectfully requests that this Court enter judgment in his favor on all claims set forth against him in the Amended Complaint.

DEFENDANT PHILIP L. CONNORS,  
By his attorneys,

/s/ Joseph L. Tehan, Jr.

Joseph L. Tehan, Jr. (BBO # 494020)

Gregg J. Corbo (BBO # 641459)

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